

INEEL PUBLIC MEETING ON PROPOSED CLEANUP
PLAN FOR IDAHO CHEMICAL PROCESSING PLANT
(INTEC)

TWIN FALLS, IDAHO

Tuesday, November 17, 1998

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PUBLIC COMMENT

See Page 57, Line 11

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1 TWIN FALLS, IDAHO, TUESDAY, NOVEMBER 17, 1998
2
3 MR. SIMPSON: Thank you for coming
4 tonight. I'm Erik Simpson. I introduced myself to
5 you earlier. I'm the community relations plan
6 coordinator for the INEEL Environmental Restoration
7 Program.

8 Really, we're here tonight to talk about
9 the Waste Area Group 3 Remedial Investigation and
10 Feasibility Study and the proposed plan,
11 specifically. And just to give you some
12 background, this is the fifth facility-wide
13 investigation that we've completed out at the lab,
14 and we have four more to go under our Federal
15 Facility Agreement and Consent Order.

16 We're here tonight because DOE had
17 thought, since the aquifers impacted due to
18 operations at the Idaho Nuclear Technology and
19 Engineering Center, that people in the
20 Magic Valley would want to be involved during the
21 comment session.

22 So, really, rather than doing a formal
23 presentation, I'll just leave it up to you guys
24 as to how you would like us to present the
25 information, but it's really your meeting at this

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1 point. But we will have an official comment
2 session for the record where Nancy will record your
3 comments verbatim.

4 DR. RICKARDS: I had heard of a 26-acre
5 sort of reburial site, and the questions I
6 generally always ask are: What are the quantity
7 of radionuclides, and plutonium-239 being the
8 favorite -- but I really need to see them all --
9 that would be reburied? And, then, how widespread
10 is the contamination in the plumage? Basically, is
11 there going to be an attempt to retrieve and
12 contain that material, or is it just going to
13 be monitored and assumed to be below federal
14 standards, eventually?

15 MR. SIMPSON: I got ahead of myself. I
16 should have introduced the project managers with
17 DOE. This is Talley Jenkins with the Division of
18 Environmental Quality. For the state of Idaho is
19 Scott Reno. And with the EPA is Matt Wilkening.
20 He's here in Wayne Pierre's absence. Wayne had a
21 prior commitment.

22 MR. RENO: The criteria for what will go
23 into the proposed soil repository and the waste
24 acceptance criteria has not yet been developed. It
25 goes hand-in-hand with the design documentation,

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1 that there will be design constraints placed upon
2 the facility and that is, that we want it to have a
3 fairly robust acceptance criteria. That is, that
4 we'll be able to take soils that may be
5 contaminated with some RCRA constituents in the
6 facility.

7 So we want it to meet minimum technology
8 requirements of the RCRA, subtitle C, landfill,
9 which is double liners, leachate collection
10 systems. And the facility will need to be designed
11 so that no leachable concentrations from the
12 facility over its design life will reach the
13 aquifer in concentrations that would result in an
14 incremental increase in the risk in the aquifer,
15 which it would be a 1 in 10,000 risk level, hazard
16 index of one. And it would have to meet drinking
17 water MCLs as well, if more conservative, which
18 they generally are.

19 DR. RICKARDS: But in terms of
20 quantities going in?

21 MR. RENO: Well, the inventory of what
22 is going in is, there is some uncertainties in the
23 soil volume that we have. We think from the
24 Chem Plant that we're going to have on the
25 order of 82,000 cubic yards. But once we start

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1 digging -- I mean, there it's invariable, you find
2 things a little bit different when you do an
3 excavation and removal remedy that we may find we
4 have a little bit less than that. We may find that
5 we have more.

6 We have generalized ideas on the
7 concentrations of the contaminants that are present
8 there. The primary risk drivers at the Chem Plant,
9 cesium-137 with surface pathways. We have some
10 sites down by the 603 facility that have europium
11 isotopes that cause a problem down there in the 603
12 building. And for the groundwater pathways, it's
13 primarily strontium-90 that's our risk driver. We
14 know we have some longer-term risks from
15 transuranics in the Tank Farm area. That's not
16 being addressed under this Record of Decision.
17 Those soils would not be candidates for disposal at
18 this facility.

19 DR. RICKARDS: Is that part of the
20 cleanup, though? I thought the Tank Farms were
21 part of the cleanup.

22 MR. JENKINS: What we're talking about,
23 as far as the Tank Farm, is that, at this point,
24 we're recommending an interim action to eliminate
25 the driving force to water, try to turn off the

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1 infiltration. But at the same time, we're going to
2 actually conduct another study to try to find out
3 how fast the plutonium is moving, how much of it is
4 there, get a better handle on the quantity and
5 concentrations. And that's what we're calling the
6 Tank Farm investigation, OU-3-14. And Scott is
7 right. At this point, that soil needs to be
8 considered for the repository.

9 DR. RICKARDS: Is there any plutonium in
10 what's going in it?

11 MR. JENKINS: There's trace quantities,
12 but there's not "TRU" levels.

13 MR. RENO: Yeah. There's trace
14 quantities of plutonium that would be going in.

15 MR. JENKINS: But there's not "TRU"
16 levels.

17 DR. RICKARDS: So are you going to
18 follow the 100 nanocuries standard?

19 MR. JENKINS: It would be less than 10.

20 MR. RICKARDS: Less than 10, but in
21 terms of quantity, like how many billions of
22 particles? You don't have an estimate?

23 MR. JENKINS: We don't have an estimate.

24 DR. RICKARDS: Even gramage or
25 curieage?

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1 MR. JENKINS: No. I would have to go
2 back and actually pull the data up to see what each
3 site has.

4 AUDIENCE MEMBER: I know that we're not
5 dealing with final solutions in the Tank Farm, but
6 if that involved digging up soil, which I don't
7 think is very likely, that soil would not go into
8 the soil repository, this one here?

9 MR. JENKINS: At this point, we're not
10 considering it candidate soils. And let's say that
11 one of the alternatives evaluated would be to dig
12 it up. We do know that there's places within the
13 Tank Farms, the soils in there did have quantities
14 or concentrations of actinides, plutonium in
15 particular that are over the 100 nanocuries stuff,
16 so it can't go there anyway. It would have to go
17 to WIPP.

18 But stuff less than 10, it depends on
19 what our criteria becomes. And the criteria is not
20 driven by the Tank Farm. The criteria is to be
21 mainly driven by protection of the aquifer. So
22 we're basically going to have to go back, calculate
23 what an acceptable source mass, or, if you want to
24 think of it that way, would be acceptable within
25 the repository.

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1 DR. RICKARDS: The thing on the
2 situation was legally, you could take less than
3 100 nanocuries transuranics from the Tank Farm,
4 putting in this official RCRA endorsed low-level
5 dump; right?
6 MR. JENKINS: RCRA compliant.
7 DR. RICKARDS: I mean, it's real legal
8 to just sort of postponing that decision?
9 MR. JENKINS: We could take the less
10 than 100 if the concentrations from that
11 material -- if it leaked -- leached to the
12 aquifer -- did not present an unacceptable risk.
13 DR. RICKARDS: I agree with what you're
14 saying. I'm just pointing out that the official
15 dump you're opening legally can take the stuff from
16 the Tank Farm, mix it with cement or whatever the
17 grounding procedure usually is and do that.
18 But the alternative that I want always
19 studied is the above-ground containment.
20 Basically, I want you to include in your impact
21 statement and scoping studies the Nevada study that
22 came out last year on the transportation of
23 plutonium into the water supply. The actual
24 individual doses of plutonium if inhaled,
25 resuspended, pumped up, integrated, and inhaled. I

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1 think, if you study it correctly, you will see that
2 containment above ground in barrels not only
3 provides jobs for the INEEL, but it is the total
4 best way to contain it. It seems to me you're
5 always in these clean-up projects delaying the
6 time's use of the 240,000 plutonium by legally
7 putting it in dumps. And that's why I have been
8 trying to ban the reburial of plutonium. But you,
9 literally, are, with this project, opening a legal
10 dump for plutonium.
11 MR. RENO: Just a quick question, I
12 guess. You know, we have a lot of soils at very
13 low concentrations of plutonium isotopes, well less
14 than the nanocurie range, down in the picocurie
15 range. Is there a threshold amount that, if we got
16 some cesium, strontium contaminated soils, just to
17 clarify, that you think might be an acceptable --
18 DR. RICKARDS: A microscopic view of it,
19 a small amount, trace amount of cesium would be
20 reasonable to be buried. But what I have been
21 asking from the beginning of the programmatic
22 impact statements on waste management at the
23 scoping end is to quantify the total end result of
24 what you reburied if you approach everything at
25 this 10 nanocurie reburial rate, or the legal

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1 100 nanocurie reburial rate. And the Pit 9
2 Record of Decision, they put into the one-acre
3 pit a 10 nanocurie concentration and estimated
4 3 to 4 pounds for the plutonium, not the soil, but
5 plutonium itself, which is literally millions, if
6 not billions of particles in each pound right back
7 into one pit. And now you're talking about a 26
8 acre, less than 100 nanocurie of plutonium pit, and
9 that's where, to me, the whole goal of the EPA law
10 is to study the big picture first. And when you
11 open the 26-acre plutonium dump, low level as it
12 may be, it is better in the long run to simply
13 contain this material in barrels, at this point
14 they estimate 400 years, at which point you can
15 rebarrel them. It is cheaper. It just takes so
16 little inspection to keep this stuff above ground.
17 What I think you-all are is in denial of that
18 eventual end point. You are systematically looking
19 for closure on these cleanup projects as opposed to
20 admitting that we have to contain this material
21 above ground.
22 MR. RENO: Okay. Comment accepted.
23 I am curious, though, maximum
24 concentration of plutonium isotopes that is in the
25 detected concentration in these 82,000 yards that

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1 we're proposing for burial in the repository, do we
2 have that off the top of our head? I think we are
3 well below the nanocurie range for all of these
4 82,000 yards --
5 DR. RICKARDS: That's actually what I'm
6 asking you, for the total quantity. Are we talking
7 about a quadrillion of plutonium particles or are
8 we talking about 10 plutonium particles?
9 MR. RENO: The answer, again, is not the
10 one you want. We don't have that number, but we
11 are seeing that the design criteria -- we could get
12 that number. But the design criteria would be to a
13 risk-based standard. And the drinking water MCL is
14 15 picocuries per liter, which by the time you
15 incorporate the daughter products, 239 is about
16 seven-and-a-half picocuries per liter, and then the
17 daughters would take it to 15 picocuries per
18 liter. So that would be our founding criteria.
19 DR. RICKARDS: This, to me, is the whole
20 problem with piecemealing the whole situation. And
21 even in the big picture, if every radionuclide
22 leaked that was there, it would meet federal
23 standards because the aquifer is so large. And the
24 big picture is that's why they view INEEL as the
25 perfect place to have a 200-acre plutonium dump

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1 that they talk about is their eventual goal.

2 Literally, our water supply is large,
3 but the medical view of radiation is to -- the less
4 human-added exposure the better, and with zero
5 being the safest limit. And we have a chance to
6 contain all this material, and yet you're going
7 through calculations you know will allow you to
8 rebury it. That's my problem with the whole
9 cleanup. You actually let it leak and it still
10 meets your standards. That's why mixing it with
11 cement is acceptable to you and putting it over
12 the water supply is acceptable to you.

13 INEEL STAFF: I might add that not
14 everybody would agree that things up above ground
15 is a safer configuration. It's subject to fire,
16 floods, personnel exposure doing inspections. So
17 if you integrated exposure over time, it's going to
18 be much greater than that which is buried, and they
19 have no exposure pathways.

20 DR. RICKARDS: But they actually have
21 never done those calculations. In the Pit 9 Record
22 of Decision, they make that statement. And they
23 say that storing it above ground would pose a
24 radiological risk to the workers' community and the
25 environment. When I asked them to produce those

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1 risk assessments, they admitted in writing that
2 they had never done them.

3 Once again, they're dismissing the best
4 alternative here verbally and in writing and in the
5 records for calculations they have never done.
6 These folks are supposed to be the waste management
7 experts, and now they're saying there is such risk
8 to managing these wastes that we can't keep them
9 above ground.

10 AUDIENCE MEMBER: No, I didn't say that,
11 Peter. What I said was that the risk would be
12 greater if it's above ground.

13 DR. RICKARDS: That there is a great
14 risk to that, greater risk to that.

15 INEEL STAFF: Above ground?

16 DR. RICKARDS: Above ground. And
17 you-all are supposed to be the waste land
18 experts. I'm saying that's what are you saying.
19 You've never documented it.

20 You're saying I misrepresented you.
21 That's why -- agreeing with you now. But what you
22 are saying is there's a greater risk to storing it
23 above ground. And I'm saying you, in writing,
24 have said that, but you have, in writing, admitted
25 you never did the risk assessment. And it

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1 contradicts -- it contradicts what your speech
2 teams say, that you are the waste management
3 experts and we can bring in high-level fuel rods
4 from around the world indefinitely with no Yucca
5 Mountain open or potentially open and store them
6 indefinitely here. And, yet, you just got through
7 saying that there is a greater risk to storing
8 above ground. And I'm asking you to document it.

9 INEEL STAFF: Well, those are two
10 different things. The fact that it's greater
11 doesn't mean we can't manage it. But we still --
12 we've got tremendous years of experience there. We
13 have the controls to do that. But when you say,
14 "Which poses the greatest risk?" then, whether the
15 Pit 9 people have done calculations or not, they
16 could be done if many more potential accidents that
17 can happen, things when they are above ground than
18 they are when they are 10 feet under ground. And
19 if you want to worry about inhalation risk from
20 plutonium, a fire would be -- take Rocky Flats.
21 There is nothing under ground that would compare to
22 that.

23 DR. RICKARDS: But in the new RCRA
24 buildings are there not good fire controls?

25 AUDIENCE MEMBER: There are, and we take

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1 great pains to do that, but there is still that
2 potential.

3 AUDIENCE MEMBER: So earth and burn.

4 MR. SIMPSON: David, I know you had some
5 issues that you wanted to discuss, some questions.

6 MR. KIPPING: Sure. On Group 1 on the
7 Tank Farm, it's quite clearly stated that what is
8 proposed is the interim solution that for about
9 the next six years until -- until, I guess, the
10 decision will be made in 2004. And so we're
11 talking about something being done in the next six
12 years, although the facility will be operational at
13 least until 2015. It seems to me that the
14 interim solution of trying to minimize the water
15 contamination seems like a reasonable approach.

16 The two things I'm concerned about is,
17 number one, the Tank Farm is by far the largest
18 amount of contamination, the biggest problem, and
19 it deserves a very, very careful look. And so I
20 want to make sure that there is an environmental
21 impact statement prepared, I think, which is a
22 little more extensive, deeper document than these
23 two set of plans, and have plenty of chances to
24 take a look at that. That is the major
25 contamination of all of INEEL. So very

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1 interesting, the schedule, apparently, that is not
 2 going to happen for a number of years.
 3 The second concern is the interim
 4 solution is, in essence, capping it, putting some
 5 dirt on it, bury it. That's the first step.
 6 Question: Is that going to be the first step
 7 towards a defacto cap and fill approach? It's not
 8 at all clear that that's the right thing to do for
 9 the Tank Farm and to leave the soil in place,
 10 capped over. Peter pointed out there are a lot of
 11 problems with that.
 12 So I'm very concerned that the interim
 13 solution will turn out, migrate into the final
 14 solution. You made it very, very clear that this
 15 is merely an interim solution and does not in any
 16 way affect whatever the final solution will be
 17 made.
 18 MR. JENKINS: I'll take that one. The
 19 first thing was, you talked about more in-depth,
 20 detailed analysis than this. What the proposed
 21 plan, the 54 pages or whatever it is, is really a
 22 summary of that document sitting over there.
 23 MR. KIPPING: 3,000 pages.
 24 MR. JENKINS: Is that what it is? It's
 25 a lot. That actually is an evaluation of all the

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1 sites, the 95 sites that we talked about in this
 2 investigation. Currently, there is an EIS going on
 3 to try to determine what they're going to do with
 4 the waste in the tanks, how they're going to treat
 5 the waste. I think there is notes in the back
 6 there.
 7 MR. KIPPING: Where are we in that
 8 process right now?
 9 MR. ROSE: The draft is under way. The
 10 draft will be issued in April for public review and
 11 comment. And the final schedule will be out in
 12 November next year.
 13 AUDIENCE MEMBER: The draft in April?
 14 MR. LOCKIE: The draft in April.
 15 AUDIENCE MEMBER: But that's the
 16 contents of the tanks, what to do with them,
 17 calcining them --
 18 MR. JENKINS: Under that EIS, what we're
 19 looking at is how to treat the waste, what to do
 20 with the tanks, how to close down facilities, kind
 21 of looking at the whole of the Chem Plant for a
 22 closure.
 23 And one of the big issues that we had,
 24 as far as trying to make a final decision on the
 25 Tank Farm, was we didn't know what was going to be

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1 left behind. So what our intent is, is to collect
 2 field data, continue our investigations that it
 3 talks about, that we would make this decision in
 4 around 2004.
 5 Leading up to that, we would take
 6 whatever comes out of the decisions on the EIS,
 7 plus whatever field data we get and make an
 8 integrative decision, and we would look at anything
 9 from no action, capping in place to a full
 10 retrieval of the soils and disposal. Some of it
 11 could end up going to WIPP, for instance. Some of
 12 it could end up at various other locations.
 13 AUDIENCE MEMBER: I'm a little
 14 confused. EIS on the Tank Farm is coming out in
 15 the draft in April of '99?
 16 MR. JENKINS: The EIS is, yes.
 17 AUDIENCE MEMBER: What is the title of
 18 this EIS?
 19 MR. LOCKIE: High-level waste and
 20 facilities disposition.
 21 AUDIENCE MEMBER: You mentioned another
 22 date like in 2004.
 23 MR. JENKINS: 2004 is another CERCLA
 24 investigation, another RI/FS.
 25 AUDIENCE MEMBER: That is an

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1 investigation of what?
 2 MR. JENKINS: The Tank Farm soils.
 3 AUDIENCE MEMBER: This is my confusion.
 4 The EIS coming out, that will deal with the Tank
 5 Farm?
 6 MR. JENKINS: It will deal with the
 7 tanks, the contents of the tanks and how to close
 8 the structure, the tanks and the concrete
 9 structure. It's not making a decision on what to
 10 do with the soils.
 11 AUDIENCE MEMBER: To deal with the
 12 Tank Farm in it's entirety is a two-step process?
 13 MR. JENKINS: Yes.
 14 AUDIENCE MEMBER: Step No. 1 is to deal
 15 with the contents of the tanks and the tanks'
 16 plumbing, et cetera, and then once you decide what
 17 to do with that, then you deal with the soils?
 18 MR. JENKINS: Then we deal with the
 19 soils on top of that.
 20 MR. RENO: The plans need to be
 21 integrated.
 22 MR. JENKINS: Now, as far as answering
 23 the second part of your question about what we're
 24 proposing as to seal the surface or whatever, for
 25 lack of a better term, get the water off of there.

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1 Yes, that's what we're proposing for the short
2 term. In all likelihood, what we're talking about
3 is continuing that until we can take a final action
4 on the Tank Farm. But that's not going to prevent
5 us from -- if the decision is made to dig it up, it
6 won't prevent that. We would give it an objective
7 evaluation.

8 MR. RAUNIG: Talley, could you
9 explain, give them a little more background
10 because I don't think he realizes the amount of
11 investigation that's already gone on in the Tank
12 Farm, let him know that we have performed risk
13 assessments. We have done several studies, and
14 there has been a lot of thought put into it
15 already.

16 MR. JENKINS: Right. As Dennis said,
17 we have done several investigations within the
18 Tank Farm. But we took the data we had
19 previously -- for this investigation, we took
20 previous data plus used process knowledge, knowing
21 how big the releases were and what concentrations
22 were in the liquids and calculated risk based off
23 of that. But one of the issues we had was how fast
24 was plutonium moving, how fast was strontium
25 moving, what do we need to do, either keep it in

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1 the soils or dig it up or stabilize it, for
2 instance.

3 We didn't have a real good handle on the
4 range of costs or the impacts, I guess, is the best
5 way to say it, in that a lot of -- we didn't know
6 where the EIS was headed, and we still don't know
7 what the answer there is. We don't know what the
8 decision is. So we're really trying to wait until
9 they make a decision so that we can add that plus
10 the soils together to make a final decision.

11 DR. RICKARDS: I take any bets that they
12 put cement into the tanks, and leave it there.
13 Just a guess.

14 MR. RENO: Well, a separations
15 alternative is one of the alternatives being
16 evaluated or is going to be evaluated in the EIS.

17 DR. RICKARDS: Is the mixing in place
18 and leaving it there an alternative that's being
19 assessed?

20 MR. ROSE: Leaving some source term
21 behind in the tanks is an alternative, all the way
22 from between that and actually ripping the tanks
23 out of the ground. So that's the tough balancing
24 act. If a decision is made on how much source term
25 to leave behind in the tanks in the facilities,

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1 that has to be added in with what's left behind in
2 the soils, if anything. Which part do you get a
3 greater share?

4 MR. JENKINS: For instance -- and this
5 is purely hypothetical. For instance, if we were
6 to leave something behind in the tanks that has
7 been grouted up, it may drive us to additional
8 remediation on the soils, either an excavation or a
9 stabilization in place such that the total impact
10 to the aquifer from both pieces still is not
11 unacceptable.

12 MR. RAUNIG: Keith, when you talk about
13 leaving things in place, you're not talking about
14 leaving the liquid in the tank. You're talking
15 about emptying the tank, rinsing the tank, then
16 whatever residual sediments might be listed.

17 MR. ROSE: As the closure plans are
18 worked out on those tanks, you can go anywhere from
19 leaving some source term behind to doing a
20 risk base type of closure versus completely
21 cleaning everything out of the tank. And, of
22 course, if the decision is made to leave something
23 behind, that eats up part of the amount of source
24 term that could be left behind in the soil and
25 still balance out a risk base.

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1 MR. NITSCHKE: Not necessarily. The
2 release rates may not coincide in time so they may
3 not be directly added -- we would have to check.

4 MR. ROSE: A cumulative of.

5 AUDIENCE MEMBER: If you look at Item 7
6 on the tank, I mean, I think that gives us a flavor
7 of the possibilities. It's basically the same
8 problem.

9 AUDIENCE MEMBER: What page is that?

10 AUDIENCE MEMBER: It's Group No. 7.

11 It's a tank. It's on page 43. I think it's not
12 really fruitful to discuss what to do with the
13 Tank Farm and the final solution. That's what EIS
14 is about. My concern is that that EIS happened and
15 we're not to gain --

16 MR. JENKINS: And that's the whole
17 intent, is not to come up with a prejudiced
18 decision.

19 AUDIENCE MEMBER: That will be dealt
20 with in the two-step process.

21 MR. RENO: We will be back out for
22 public comment under review once we completed the
23 RI/FS and prepared a proposed plan as to what to do
24 with those soils for final solution.

25 DR. RICKARDS: Are they going to cap

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1 around the Tank Farm, basically?
 2 MR. JAMES: What we're proposing?
 3 We're required to reduce the infiltration by
 4 80 percent. I don't think we should prejudice the
 5 remedial design to cap or cover. The real intent
 6 is to reduce the infiltration and to decrease the
 7 driving force on escaped contaminants in the soil
 8 in that vicinity in the Tank Farms.
 9 DR. RICKARDS: And that's 80 percent
 10 reduction of rainfall?
 11 MR. JAMES: Rainfall and snowmelt,
 12 runoff.
 13 DR. RICKARDS: Is the Tank Farm itself
 14 the source of most of the liquid coming up?
 15 MR. JAMES: The Tank Farm itself is not
 16 particularly the source of liquid. The liquids
 17 come from the perc ponds, the various
 18 contributions. Scott probably knows the most
 19 about the distribution of liquids.
 20 DR. RICKARDS: I thought the Tank Farms
 21 were leaking some.
 22 MR. RENO: There have been leaks from
 23 the piping from the valve boxes.
 24 DR. RICKARDS: Are they all sealed now?
 25 MR. RENO: We're not aware of any

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1 ongoing releases. If there were, we would be there
 2 trying to stop them.
 3 MR. JAMES: We're not aware of any leaks
 4 in the tanks either, are we?
 5 MR. ROSE: No.
 6 MR. JAMES: The presumption is if the
 7 tanks have a leak, it's the piping.
 8 AUDIENCE MEMBER: We've had some past
 9 leaks and built up a body of contaminants in those
 10 soils.
 11 AUDIENCE MEMBER: How did you find out
 12 about those leaks if they were underground?
 13 MR. JENKINS: For instance, you would
 14 transfer so many gallons from one building, and it
 15 never arrived, or transferring liquid from one tank
 16 to another, and it didn't arrive.
 17 MR. JAMES: Sometimes alarms go off.
 18 MR. RAUNIG: The value locks, you know,
 19 there is always some alarm.
 20 MR. RENO: All those lines were
 21 upgraded under the NON consent order a few years
 22 ago. So they are all double contained, RCRA
 23 compliant lined. The tanks themselves are not.
 24 AUDIENCE MEMBER: The tanks are not in
 25 vaults? I thought they were.

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1 MR. RENO: They are in vaults, but
 2 they're not RCRA compliant.
 3 Anyway, in the course of operations in
 4 the Tank Farm, the upgrades, other releases have
 5 been identified there. We think there are, in
 6 total, about 25,000 gallons of liquids have been
 7 released in the Tank Farm area from all the various
 8 releases that we've accounted for.
 9 AUDIENCE MEMBER: Since when?
 10 MR. LOCKIE: The '50s, when they started
 11 processing. There have been two major spills
 12 historically. We don't want to leave an impression
 13 they were leaking frequently out there. We haven't
 14 had leaks in the lines for years and years and
 15 years.
 16 MR. JAMES: It's most recent in the
 17 RI/BRA and different operations. It's still a
 18 pretty good record.
 19 MR. JENKINS: For instance, the biggest
 20 one that we've had was a 13,000-gallon spill in, I
 21 think, October or November of -- late '72, I think.
 22 MR. LOCKIE: It was late '70s --
 23 MR. JENKINS: Either '72 or '74. And
 24 then the other large one was about 3600 gallons
 25 that basically was from -- over a 21-year period

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1 starting in about '52 or '54 and ending in around
 2 '72.
 3 MR. ROSE: The way those spills have
 4 been -- the source term, I believe, has been found
 5 out to be more specific as we did this major
 6 high-level-waste Tank Farm upgrade project. Of
 7 course, you remove a lot of the soils and you find
 8 hot spots and you quantify those source terms.
 9 MR. RAUNIG: It's also kind of amazing
 10 if you look back at some of the current reports
 11 over the years. These people didn't take these
 12 releases lightly. They were investigated
 13 thoroughly. They were thorough in documentation
 14 when applicable, and they could get into it. They
 15 cleaned up the soil at the time. They removed it.
 16 They put it in a contained area and removed it from
 17 the personnel and placed it an area where you could
 18 keep an eye on it and make sure that people and
 19 animals wouldn't get to it. And they also
 20 calculated the source terms.
 21 MR. RENO: If I could, I want to mention
 22 one more thing. I heard mentioned a couple times
 23 an indication that maybe you might be looking for
 24 an EIS on these soils in the future. The CERCLA
 25 process with spills are equivalent to the NEPA

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1 process.

2 There will be a new Remedial
3 Investigation and Feasibility Study. That will go
4 into an administrative record. It will be
5 available for public review. We'll issue a
6 proposed plan with a preferred alternative, and
7 then there will be an opportunity for public
8 comment that occurs in conjunction with the CERCLA
9 process.

10 MR. JAMES: We discussed that during the
11 informal part of the meeting. Is it true that
12 there is no longer any controversy about CERCLA
13 being the functional equivalent of NEPA? Because
14 EPA is really the subject matter expert in that.
15 There's no longer any controversy, is there, Matt?

16 MR. WILKENING: Not from Superfund's
17 point of view. We've always considered ourselves
18 to be an RI/FS, to be functionally equivalent to a
19 NEPA documentation of an EIS.

20 AUDIENCE MEMBER: So there will be
21 two -- the available document and then the one from
22 later, which will be different formats for
23 different bureaucratic reasons but are formal
24 public documents that deal --

25 MR. WILKENING: Yes.

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1 AUDIENCE MEMBER: One other question on
2 the Tank Farm. Currently, the waste in the Tank
3 Farm is being run through the calciner and EPA has
4 its own problems in terms of things. Will the EIS
5 deal with the calciner? Where does the calciner
6 fit in? Where does it fit in?

7 MR. LOCKIE: The high-level waste, the
8 EIS, evaluates a range of alternatives to process
9 the remaining liquid in tanks. Some of those
10 alternatives include calcination, but some don't.

11 AUDIENCE MEMBER: So the April EIS, one
12 of the alternatives will be use the calciner, and
13 there are the problems with the calcine.

14 And another alternative might be not to
15 calcine, which implies the calcine can be torn
16 down.

17 MR. LOCKIE: Correct. And that process,
18 again, is due to wrap up -- the final EIS
19 distribution in November of '99 and a Record of
20 Decision soon after that. We're currently under
21 constraint order to make a -- for the department to
22 make a decision by June of 2000 whether to operate
23 or to close the calciner unit. This chart just
24 shows some of the range of alternatives that will
25 be included in the EIS. Again, some include

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1 calcination; some do not.

2 AUDIENCE MEMBER: The calciner, I
3 wouldn't put a lot of money in it.

4 MR. LOCKIE: It certainly has some
5 difficulties if we permit it in the future.

6 AUDIENCE MEMBER: I'm done with my
7 thoughts and comments and questions on the Tank
8 Farm.

9 DR. RICKARDS: I was just curious, the
10 soils under the building, that's sort of totally
11 different from the Tank Farm situation. And then
12 quantity-wise, I mean, it just seems like you're
13 not going to excavate those because the Chem Plant
14 is there to stay, it seems. And quantity-wise do
15 we have any quantity of what those materials amount
16 to? Are you going to look at stabilizing them, or
17 what are you looking at?

18 MR. JENKINS: We have four sites under
19 the buildings group. The first one is, basically,
20 under the 603 complex on the dry side. That was an
21 old French drain or dry well where basin and
22 recirculation water was disposed of periodically.
23 It operated from like '57 to '66, I think,
24 somewhere in that time frame.

25 Another one -- we have two under the 604

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1 with the PEW system. One was where we found liquid
2 underneath the steel liner in one of the hot
3 cells, and it may or may not have leaked to the
4 environment. We assessed it as if it had.

5 And then when they were doing a life
6 safety upgrade, putting a fire exit underneath the
7 604, kind of a tunnel type thing, they dug through
8 some contaminated soil there. Then we have a
9 release under 601. That was basically a steel line
10 that corroded away, and it transferred acidic
11 solutions. We have a pretty good handle. We know
12 about roughly 550 curies where it leaked to the
13 environment from that release.

14 In the case of what to do with them,
15 this is one of the issues -- this is one of the
16 issues that's kind of really linked to the EIS. We
17 don't know what D&D -- which, and the facility
18 disposition part of the EIS -- we don't know what
19 the decision will be to do with those three
20 buildings.

21 So, really, what we're talking about is
22 a deferred action. And the facility disposition
23 stuff could be anywhere from complete removal of
24 the building to entomb it in place. I tomb it,
25 into concrete, for lack of a better analogy. What

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1 we looked at was three alternatives. No action,
2 again, for comparison. But we looked at placing a
3 cap or containment structure, multi-layered cap
4 over the release site following D&D if the building
5 is left behind.

6 And Alternative 3 is really
7 Alternative 2, if the building stays in place,
8 or if the building is removed, we would excavate
9 the soils and dispose of them at the repository if
10 it's constructed.

11 MR. RENO: Or another suitable facility,
12 if it's not constructed.

13 DR. RICKARDS: But right now we're using
14 the Chem Plant to store all the fuel there, aren't
15 we?

16 MR. JENKINS: Yes.

17 MR. LOCKIE: That 603, you mean?

18 DR. RICKARDS: Yeah.

19 MR. LOCKIE: The fuel is being
20 transferred out of 603 to a newer fuel storage.

21 MR. JENKINS: This is the dry side,
22 though, Keith.

23 MR. LOCKIE: Oh, the dry -- I'm sorry.

24 DR. RICKARDS: So you're talking about
25 sectioning part of the building from D&D, then?

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1 MR. RAUNING: That is one of the
2 forthcoming. Those basins are going to be shut
3 down and the fuel has been -- as you're probably
4 aware, going to be transferred out.

5 DR. RICKARDS: I guess I really don't
6 know, where is the dry storage taking place?

7 MR. RENO: It's on the west side of the
8 603 building. There is a graphite fuel storage
9 facility there. It's indoors.

10 This is our 603 building and the three
11 storage pools are here (indicating) and go north
12 like this. This structure that comes out here to
13 the west is the Graphite Fuel Storage Facility.

14 MR. RAUNING: You can see the slight
15 difference in the shading.

16 MR. JENKINS: You might point out where
17 the other ones are, too, the other locations for
18 dry storage.

19 MR. RAUNING: This is the 749 fuel
20 storage area. And those are concrete-lined steel
21 silos in the ground. And this is the FAST
22 Facility, and that's a basin storage area and then
23 the product storage of uranium.

24 MR. JENKINS: You might want to point
25 out where they're building the new --

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1 MR. RAUNING: Your point about
2 above-ground monitor and retrieval storage, that's
3 what they are doing with the Three Mile Island
4 fuel. And that facility has been a well-engineered
5 concrete pad and then highly rigorous concrete
6 containers to put them in, and that is in this area
7 right here (indicating).

8 AUDIENCE MEMBER: Above ground?

9 MR. RAUNING: Above ground, all above
10 ground.

11 MR. RENO: That fuel is supposed to be
12 ready for shipment out of state by 2035 under the
13 settlement agreement, all that fuel.

14 MR. RAUNING: Little silos that you can
15 load and unload easily.

16 DR. RICKARDS: I guess I just want to
17 stress for the scoping, again, to quantify -- I
18 mean, the list goes to plutonium-239 and through
19 the whole gamut, there, of the soil under the
20 building group. I was a little confused there, but
21 it does look -- since you're moving the stuff out
22 of the wet area, so to speak, that you couldn't
23 actually go down and excavate the soil. Is that
24 being studied?

25 MR. JENKINS: Depending upon what the

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1 decision to do with building is. If the decision
2 made under the EIS is to take the building away, we
3 dig up the soil. But we don't know what the
4 decision is going to be made.

5 In the case of Keith, he is really doing
6 the staff work, the analysis -- or is involved in
7 the analysis. The actual decision on what will be
8 done with the waste and what will be done with the
9 buildings may be on plutonium.

10 MR. RENO: We will close them as a
11 landfill. If the D&D program, if they employed it
12 on itself and close it in place and grouted up.

13 Those decisions have not been made. The
14 state has some involvement in what is acceptable to
15 us and a lot of these facilities, the RCRA status
16 facilities in particular, we have tremendous say
17 over how those closures may or may not occur.

18 And in the event that there needs to be
19 a clean closure at the interim status facilities,
20 these facilities need to be completely dismantled
21 and taken to a disposal facility somewhere else,
22 and if those are exposed, we will excavate them and
23 remove them.

24 Over the interim, we believe that the
25 facilities themselves are providing the functional

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1 equivalent -- the word, again, but of a cap, that
2 is, is preventing infiltration of precipitation
3 through the buried wastes or the subsurface waste.

4 MS. STEWART: My comment on the whole
5 Group 2 is this seems -- to even consider it seems
6 premature. We're kind of putting the cart before
7 the horse. We're making decisions now on how the
8 soils are going to be dealt with when no decision
9 has been made and how the building is going to be
10 dealt with. It seems to me the logical thing to do
11 is to decide what's to be done with the building,
12 probably on a case-by-case basis. What are we
13 going to do with 603? Are we going to tear it
14 down? Cap it over? Take the pieces away,
15 whatever? And then having made that decision,
16 we'll have -- we can say, "What are we going to do
17 about the soils?"

18 It's not clear that even if the building
19 is dismantled completely and taken away, that all
20 buildings will be dealt with -- the soil will be
21 dealt with in the same way. So, if I were doing
22 it, I would just strike Group 2 from the plan
23 entirely because, in fact, no decision has been
24 made. You're saying that when some other decision
25 was made, we're going to apply this decision we've

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1 made now. That doesn't make any sense.

2 MR. JENKINS: I guess my answer for that
3 is, you're correct, in that this is one that we
4 have struggled with. How do you make a decision, a
5 cleanup decision, that you can't implement until
6 some other program has done their part? And we've
7 struggled with that.

8 AUDIENCE MEMBER: You don't.

9 MR. JENKINS: We're struggling with
10 that.

11 MR. RAUNING: And also we know it's a
12 release and we can't ignore it, so we need to
13 formally keep it into the CERCLA process so it
14 does get dealt with and doesn't get lost in the
15 shuffle. So it's a way to make sure that the site
16 is addressed eventually.

17 MR. RENO: And then the real crazy
18 option, of course, especially for a site that is
19 underneath the dry fuel storage area, say, we'll
20 move the building right now so we can go after it.
21 Of course, that's -- and probably not the smart way
22 to do business either, but your comment is noted,
23 and we appreciate you --

24 MS. STEWART: The alternative is the No
25 Action Alternative because no action is going to be

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1 done as a result of this decision. I mean, if we
2 accept the recommended alternative, what is going
3 to happen? The answer is, absolutely nothing until
4 some other things happen. And if we tear the
5 building down, haul it away, it's not clear that
6 digging up the soil is the right thing. Maybe
7 entombing it and capping it is the right thing.
8 That's not clear. They're related items. You
9 can't make a decision like that. So we're making
10 decisions which could be wrong decisions.

11 MR. RENO: We do have mechanisms in the
12 future for amending the Record of Decision or
13 issuing an explanation of significant difference,
14 but I'm not disagreeing with your comments.

15 MS. STEWART: I would recommend
16 on Group 2, giving it, to accept the
17 No Action Alternative and that would be --

18 MR. RENO: We need to defer to the
19 decision, I think, is what you recommend.

20 MS. STEWART: That is the fact of what
21 it is. Then when one decides how to dispose of the
22 building, then the soils --

23 MR. JENKINS: Then pick it up again.

24 MR. RAUNING: I just want to clarify
25 that we wouldn't call it a No Action because a

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1 No Action means we don't have a risk there, and
2 this still could present a risk.

3 DR. RICKARDS: I unfortunately have to
4 go to a hog meeting, Erik. Are you still following
5 the agenda?

6 MR. SIMPSON: What is a hog meeting?

7 DR. RICKARDS: One's coming to Twin so I
8 have to go. But in terms of the scoping meeting, I
9 do want to thank you all for coming to Twin. The
10 crowds, nobody comes to anything.

11 But at any rate, the Nevada study -- you
12 talked about studying the mobility of plutonium and
13 everything. In what terms -- the only reporter I
14 got to ask you-all about, that was Tim Jackson, and
15 the comments might have been from Alan Jines, is
16 that it's different. The plutonium down there was
17 different, therefore it doesn't count.

18 That is always why they have said they
19 can rebury the plutonium to bind with clay. In the
20 Nevada study, it was bound to the clay and
21 submicron particles floating in sediment in the
22 water. So to me, it fits every principle you've
23 ever said. It does bind to clay. To me it's proof
24 that it is mobile, proof that we shouldn't bury
25 it.

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1 So one of the things -- I'll give you
2 your answer in a second -- but to make sure my
3 scoping questions are officially in, is the
4 individual effects of individual particles, these
5 materials resuspended, all of the radionuclides,
6 but the CDC group that I'm in definitely doesn't
7 appreciate the inhalation, even a single particle
8 to the doctors that come to present their
9 information to us. And, basically to, one, study
10 that on the impact of your results because, I mean,
11 basically, it seems to me they are picking it up,
12 moving it to a new location in the soil or leaving
13 it where it is, and since your alternatives are the
14 same, it's probably better just to leave it where
15 it is. But at any rate, what are your comments on
16 the Nevada study?

17 MR. RENO: I guess they were not
18 specific to that study, but more how contaminates
19 and transport issues are related to our Tank Farm
20 investigation. We will look at that study. There
21 is also some other work that's being done by
22 Clemson, which indicates that under some conditions
23 facilitated transport of plutonium may occur. That
24 is mode of transport. And that under some
25 conditions plutonium may be moving a little bit

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1 faster in some places than others.
2 Now, the conditions at the Chem Plant
3 are very different than those at the RWMC. They
4 are examining that problem in our case. We have a
5 waste stream that was dissolved in concentrated
6 acids. There were several other metals involved
7 and how the interaction of these low PHs and the
8 other constituents that were present, the site
9 specific pathology at the Chem Plant interplays is
10 the question we're going to answer.

11 We're proposing the Chem Plant put in a
12 large number of blow holes to try to develop a 3-D
13 picture of the contamination on the Tank Farm.
14 We're proposing to put in monitoring wells closer
15 to those releases than ever before and to sample
16 down below this waste and actually go through some
17 of the hotter stuff, if we can, at the Chem Plant
18 and to get concentrations, plutonium and other
19 isotopes, at depth.

20 So we're going to look at this
21 real-world experiment from 1952 when plutonium was
22 first released at the Tank Farm to see how far it
23 has gone. This whole investigation of the Tank
24 Farm has been like peeling an onion. It's
25 dangerous stuff there. We think the soils there

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1 are as high as 400 REM per hour. If they are that
2 high, then a worker would expose -- the drill
3 cuttings from that could exceed their institutional
4 dose limit in

5 13 and a half seconds. So we don't take this
6 lightly in going in there. There is a lot of
7 safety issues that we will have to resolve before
8 we do the investigation. Just a moment.

9 DR. RICKARDS: 400 rem per -- I wanted
10 the unit.

11 MR. JENKINS: Per hour.

12 DR. RICKARDS: I didn't mean to
13 interrupt you.

14 MR. RENO: I try to maintain my kind of
15 thought so I know you're going to be interested in
16 this.

17 Then we're proposing to do some
18 laboratory studies to determine plutonium migration
19 rates. We're going to look at the chemical -- the
20 geochemical environment in the Tank Farm. You
21 know, what chemical form for oxidation state is the
22 plutonium in and the other isotopes. We're going
23 to do column studies. We're going to do batch
24 studies, and we're going to answer this question
25 once and for all. That is our goal. How fast are

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1 these isotopes moving and how fast do we decide how
2 to manage it?

3 DR. RICKARDS: I notice that you were
4 looking in at least one of these things at 1000
5 years, that is what they look for in Pit 9, right?

6 MR. RENO: A thousand years of what?
7 For a cap?

8 DR. RICKARDS: Yeah.

9 MR. RENO: That number is only
10 because -- I mean, how do you design anything to
11 last longer than that? That's the question. At a
12 minimum of 1000 years is the goal.

13 DR. RICKARDS: But that is the trouble
14 with the plutonium. I mean, when you take it above
15 100 nanocuries, they are having to prove a
16 10,000-year institutional life. And the more it
17 leaks out, the more it meets your ability to leave
18 that thousand-year estimate. That is where I think
19 the EPA has to step in and say it's inappropriate
20 to have low-level standards in this large a
21 quantity. If you're dealing with this much waste,
22 10 nanocurie standard is fine. If you're dealing
23 with billions and billions of these particles and
24 slipping them in under the 100-nanocurie standards,
25 it's inappropriate to look at the thousand years, I

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1 think, and inappropriate not to look at the effect
2 of releasing billions of those to our water supply
3 to be brought up and inhaled.

4 Literally, I think that you can put more
5 plutonium in Idaho through those standards than you
6 can in New Mexico because they have a 6-million
7 cubic feet limit.

8 Anyhow, good to see you-all.

9 MR. SIMPSON: Margaret or David, did you
10 have any questions about the aquifer contamination
11 at all?

12 AUDIENCE MEMBER: I had a question
13 about drinking water standards, a little bit of
14 clarification on where the drinking water standards
15 are to be met. Are they to be met at the source or
16 the INEEL boundary?

17 MR. JENKINS: I'll tackle that one.
18 What we're looking at, as far as the aquifer, is to
19 restore the entire aquifer drinking water standards
20 by 2095. That, essentially, means anywhere within
21 the aquifer. There is still discussion on whether
22 that includes the area underneath Chem Plant proper
23 or not. And that is a decision that we will
24 memorialize at some point in the Record of
25 Decision.

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1 AUDIENCE MEMBER: So it's not at the
2 source or at the boundary?

3 MR. JENKINS: It's throughout.

4 MR. JAMES: At least up through the
5 Chem Plant boundary is as far as it will go away
6 from the source.

7 The problem lies, I think, in some of
8 the very immobile things that went down in the
9 injection well or stuck right there. And being
10 immobile, they are hard for us to go and get back.
11 So the least we'll do is meet it at the Chem Plant.

12 MR. JENKINS: Yes.

13 MR. RENO: Based on a point of
14 compliance at the Chem Plant boundary, but it also
15 looked at peak concentrations within the aquifer.

16 MR. JAMES: Right. The high
17 concentrations of the mobile constituents may be
18 moving, for example, the iodine and tritium.

19 MR. JENKINS: The only constituent that
20 is of a concern, long term underneath the
21 Chem Plant proper is the little amount of mercury
22 that was pumped down in the injection well when it
23 was used. In the case of the other constituents of
24 concern, the tritium, it will decay away. The
25 strontium, if we take a few actions we can make it

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1 go away. The iodine, the actual hot spot, is south
2 of the Chem Plant, anyway, so that's what I meant
3 by that.

4 AUDIENCE MEMBER: I have a little
5 problem with the iodine. So you're saying even
6 though it's beyond the boundary of the Chem Plant
7 right now, the hot spot...

8 MR. JENKINS: Yes. We're still going to
9 restore that iodine. We're still going to restore
10 the aquifer even though it's outside the Chem Plant
11 fence because it was a release from the Chem
12 Plant.

13 AUDIENCE MEMBER: Mercury is the only
14 other one.

15 MR. JENKINS: We know there was mercury
16 pumped down there. And when they closed the
17 injection well, they took one sample out of there,
18 and it did have trace quantities of mercury in it.
19 We believe, based on the modeling and how mercury
20 travels in the environment, it's probably isolated,
21 maybe within a couple feet of the injection well,
22 anyway.

23 MR. RAUNING: Trace quantities?

24 MR. JENKINS: I think it was two times
25 the drinking water standard, about two to three

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1 times the MCL that was pumped down there.

2 MR. RENO: There was a one-time
3 incident, it was couple pounds at one time.

4 AUDIENCE MEMBER: So if it's a couple
5 pounds, it gets you mercury?

6 MR. RENO: Yeah, right.

7 AUDIENCE MEMBER: That was my only other
8 question.

9 MR. SIMPSON: Did you have any other
10 issues or concerns that you want us to go through
11 as far as -- I know you guys were here early during
12 the workshop. Do you want us to go through any of
13 these other slides for you?

14 MR. JAMES: You folks had two questions
15 that I couldn't answer. One was the one that Matt
16 handled about CERCLA and NEPA equivalency. And the
17 other one I can't recall. I know we talked
18 about --

19 AUDIENCE MEMBER: That was my question.

20 MR. JAMES: We did talk about, also, the
21 reason the Tank Farm is being closed under the EIS,
22 the fact that it's an existing facility and the
23 tanks haven't leaked, so it's not really CERCLA.
24 It deals with releases or risks of releases. To
25 the best of knowledge, the tanks themselves haven't

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1 had any leaks or risks. So they are operational
2 facilities. That is why they are involved in the
3 NEPA process.

4 MR. SIMPSON: Is this format working
5 well for you guys?

6 AUDIENCE MEMBER: Yes. We informally
7 discussed it. I would like to make a couple
8 comments for the record. Regarding the soil
9 repository, which has some name I've forgotten.

10 MR. RAUNING: ICDF.

11 INEEL STAFF: It is my understanding --
12 I just want to make this for the record that this
13 is a permanent solution forever. That there will
14 be a cap or a liner at the bottom and it will be
15 properly capped and contaminated soils will be
16 placed there, initially, in the old percolation
17 ponds. And we believe that will be safe for a
18 thousand-plus years.

19 It is also my understanding, aside from
20 contaminated soil, that other things will go in
21 some of the soil including concrete from breaking
22 up buildings, contaminated equipment, and
23 contaminated structures broken up into bite-size
24 pieces. So that is the intent of that disposal
25 site to probably the majority of things will be

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1 contaminated. The volume will be contaminated
2 soil, but, in particular, if the choice is to tear
3 buildings down, then certainly the debris from
4 those buildings, some or all of it is candidate to
5 go in there. Some cannot go there because of
6 too-high levels of radioactivity to some other
7 place.

8 So the ICDF -- that's what it is -- is a
9 generalized disposal facilities. It's also my
10 understanding that it is a centralized facility for
11 other clean up areas, Test Area North in
12 particular, and anything else that does produce
13 soils or debris will go there. They will not have
14 their own separate repositories. That largely is
15 due to economic arguments.

16 I wanted to make that for the record.

17 MR. WILKENING: I do work at the Test
18 Area North Site, and MY proposed plan will be out
19 shortly on that. We have a limited volume of soil
20 that we're going to have to deal with out of that
21 site that we will excavate and store on the INEEL.

22 It is, indeed, if this is built, this
23 would be a likely candidate for disposal of that
24 soil. We have talked to the folks at the RWMC, and
25 they do, indeed, have -- since we have such a low

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1 quantity of soil, they do, indeed, have room for
2 our soil as well. So, our particular action at TAN
3 is not contingent on the construction of this
4 facility.

5 MR. JAMES: It's also true that the
6 existence of the facility will not be a carte
7 blanche for hog and haul disposal. Every outside
8 WAG 3 source will have to be authorized by their
9 individual ROD to use that facility.

10 MR. RAUNING: And it's only CERCLA waste
11 through the CERCLA clean up.

12 AUDIENCE MEMBER: When you say "outside
13 source," do you mean outside --

14 MR. JAMES: Bob, outside of WAG 3.

15 MR. RENO: But within the INEEL. There
16 is no off-site waste.

17 AUDIENCE MEMBER: Again, you made the
18 point that there will not be waste brought in from
19 outside of INEEL to go in under any circumstances.

20 MR. JENKINS: Absolutely not.

21 MR. RENO: If there was to be a
22 permanent facility in the future, that would be
23 done outside the purview of this process. And it,
24 again, would need to go out for some type of public
25 involvement.

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1 AUDIENCE MEMBER: At present there is no
2 proposal?

3 MR. RENO: No, there is no proposal for
4 any additional. We can't absolutely rule out
5 someday in the future somebody may come from the
6 state of Idaho with a permit application to say
7 that we want to build a facility for X type of
8 waste.

9 MR. JENKINS: It would have to be dealt
10 with on its own.

11 MR. WILKENING: Right.

12 AUDIENCE MEMBER: On Group 4, the
13 perched water -- thank you very much for clearing
14 up a lot of that for me. That was pretty foggy in
15 terms of what that was all about. I know it's very
16 complicated.

17 I noticed some new information that was
18 in your handout that wasn't in the document, is the
19 source of recharged water to the perched water,
20 67 percent percolation pond, the plan is to get rid
21 of them, and 24 percent from the Big Lost River,
22 and that is in rain and snow, 6 percent. It seems
23 to me that says the chances of doing something with
24 the Lost River are pretty high because it is a
25 quarter of the recharge. And so I would point that

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1 out that --

2 MR. RENO: I think that we would agree
3 with that.

4 AUDIENCE MEMBER: The document says that
5 dealing with the Lost River, which is in Phase 2 is
6 just a probability, but it appears I would say that
7 that is almost an uncertainty, but it looks like it
8 would be quite effective, if you could stop it from
9 raining and snowing it would help a little bit. So
10 that is an observation.

11 Group 6, the gas cylinders, there is no
12 doubt in my mind that Alternative 2, dig it up and
13 do the right thing, is still the only thing that
14 should be done. I'm, of course, appalled that gas
15 cylinders were buried to begin with. I know a
16 little bit about that business and why didn't you
17 take the gas cylinders and ship them back to the
18 manufacturer and pick up your five cent per bottle
19 rebate. But that's history. Anyway, let's fix the
20 mistake 100 percent, which, very interesting, is
21 the least expensive approach.

22 MR. JENKINS: I want to point out one
23 thing on there.

24 AUDIENCE MEMBER: That is history.

25 MR. JENKINS: I was going to try to

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1 explain part of the reason that shows up so much
2 less costly than, say, No Action. What the No
3 Action involves is, it basically has 100 years of
4 institutional controls and monitoring and all
5 those.

6 You got small costs spread over a long
7 time, which adds up to a significant -- lots of
8 money versus a couple-year project, you go take
9 care of the problem and it's gone.

10 MR. RAUNING: That industrial gas site,
11 too, I think one of reasons that it happened in the
12 first place was it wasn't like the Department of
13 Energy or Atomic Energy Commission or whoever it
14 was at the time that said, "Oh, yeah, you can do
15 that." It was just the subcontractor that finished
16 construction, went out and did it, and nobody
17 stopped him.

18 AUDIENCE MEMBER: But that is water over
19 the damn into the aquifer.

20 Finally, on Group 7 on this whole tank,
21 I'm pleased to see that the solution is to dig it
22 up, dispose of the tank, dispose of the contents of
23 the tank and the sludge and do that. And what is
24 the time schedule on that, fairly roughly?

25 MR. JENKINS: We would have that one

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1 cleaned up by, probably, 2006, by no later than
2 2006 to 2008.

3 AUDIENCE MEMBER: But that would be well
4 before any substantive action taken on the main
5 Tank Farm?

6 MR. JENKINS: Yes.

7 AUDIENCE MEMBER: I like the removal
8 option because it's kind of a prototype or a pilot
9 of what can be done with the Tank Farm, but you
10 will certainly learn some things pro and con.

11 And I commend you for recommending
12 that. And its goes well for possibly that solution
13 being a reasonable one for the Tank Farm would be
14 my personal choice at this point. So that's all of
15 my comments and whining. Do you have any more?

16 AUDIENCE MEMBER: Dave covered most of
17 them. I just really, really want to emphasize one
18 of the things that David emphasized was the fact
19 that I don't want to see an interim action on the
20 Tank Farms get so far -- I don't want it to get
21 past the point of no return where you put so much
22 time and so much money into this action that it
23 becomes the final solution when it really shouldn't
24 be the final solution.

25 Because no matter what happens to the

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1 entire site, there is going to be a tremendous
2 amount of waste remaining over our aquifer, even
3 when it's called clean up, cleaned up, and that
4 also is a great worry. So I always come back to
5 that, where are we when we get there?

6 MR. RENO: I think as long as the
7 Tank Farm contamination is as severe as we
8 understand it to be, unless we find out there is
9 some radically different information there, and as
10 long as there is a Federal Facility Agreement, but
11 the Tank Farm will receive some additional work
12 under a subsequent Record of Decision, a final
13 Record of Decision.

14 MR. JENKINS: I guess what I would say
15 is we will give it an objective evaluation.

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OFFICIAL PUBLIC COMMENT

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1 MR. SIMPSON: For the sake of process,
2 we have to have an official comment period
3 session. Would you guys like to make a comment for
4 the record, so to speak, so that the agencies will
5 respond to your comment in the Responsiveness
6 Summary?

7 AUDIENCE MEMBER: I thought that's what
8 we were doing?

9 MR. SIMPSON: We can go through the
10 transcript and pull out your comments and respond
11 to them, if that's okay with you?

12 AUDIENCE MEMBER: I think that would
13 make sense. It's been kind of an informal session
14 and a lot of it I've gotten a satisfactory response
15 on a lot of them.

16 MR. RAUNING: We may have some of the
17 responses already written for you.

18 If you think of something else, fill in
19 the form in the back.

20 MR. RENO: There were very good comments
21 and very constructive comments, and those types of
22 comments are always welcome.

23 AUDIENCE MEMBER: This seems like the
24 most successful kind of set-up so far. I know you
25 can't do it with a room full of people, but for

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1 this crowd.

2 MR. SIMPSON: It makes more sense than
3 doing a formalized presentation. I think you get
4 better interaction when you're talking to us
5 directly in a round table session.

6 AUDIENCE MEMBER: We have read this in
7 detail so it's not new.

8 MR. JENKINS: I hope we answered your
9 questions.

10 AUDIENCE MEMBER: You did very much.
11 The formal session was very good. It isn't easy.
12 I just -- the whole business with the injection
13 well and all that stuff that you gave was very,
14 very useful. Now I understand. Frankly, I really
15 didn't understand it.

16 MR. SIMPSON: I just wanted to remind
17 you that the comment period is open until
18 December 22nd. We would be willing to do a
19 briefing if you guys have some questions during
20 your further review of the documents. You can call
21 me. I can leave my number after this, but we would
22 be willing to do a briefing if you want more
23 information.

24 AUDIENCE MEMBER: We may take you up on
25 that to answer specific questions, if we can think

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1 of any.

2 MR. SIMPSON: Thanks for your
3 involvement. We appreciate it.

4 MR. RAUNING: It takes a lot of time and
5 energy to do what you're doing. We're glad that
6 you're here.

8 (Meeting concluded at 8:45 p.m.)

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1 STATE OF IDAHO)
2) ss.
3 County of Ada)

4 I, NANCY SCHWARTZ, a Notary Public in
5 and for the State of Idaho, do hereby certify:

6 That said hearing was taken down by me
7 in shorthand at the time and place therein named
8 and thereafter reduced to computer type, and that
9 the foregoing transcript contains a true and
10 correct record of the said hearing, all done to the
11 best of my skill and ability.

12 I further certify that I have no
13 interest in the event of the action.

14 WITNESS my hand and seal this 30th day
15 of December, 1998.

16 
17 Nancy Schwartz, Notary
18 Public in and for the
19 State of Idaho

19 My commission expires:

20 September 28, 1999

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